

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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08 Civ. 7252 (PGG)

VLAD LYUBOVNY p/k/a "DJ VLAD,"

Plaintiff,

-against-

WILLIAM LEONARD ROBERTS II p/k/a "RICK ROSS,"

Defendant.

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**PROPOSED VERDICT SHEET**

The parties respectfully submit the following proposed verdict sheet.

Dated: March 26, 2010

Respectfully submitted,

CAPLAN & ROSS, LLP

By: S/Brian D. Caplan  
Brian D. Caplan (BC-1713)  
100 Park Avenue, 18th Floor  
New York, New York 10017  
Phone: (212) 973-2376  
Fax: (212) 661-4290  
*Attorneys for Plaintiff*

DONALDSON, CHILLIEST & MCDANIEL, LLP

By: S/Xavier Donaldson  
Xavier Donaldson, Esq.  
1825 Park Avenue, Suite 1102  
New York, NY 10035  
T: (212) 722-4900  
F: (212) 722-4966  
*Attorneys for Defendant*

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**VERDICT SHEET**

We, the Jury, unanimously find as to Plaintiff's Claim for Civil Assault as follows:

1. Is it more likely than not that Plaintiff was assaulted on August 10, 2008?

\_\_\_\_\_  
Yes or No

(If your answer is no, your verdict is for the defendant and you should answer no further questions. If your answer is yes, proceed to the next question.)

2. Is it more likely than not that Defendant, through overt participation or some form of encouragement, intentionally, knowingly, or recklessly caused bodily injury to Plaintiff by commanding, directing, advising, encouraging, procuring, controlling, aiding or abetting the assault that occurred on August 10, 2008?

\_\_\_\_\_  
Yes or No

(If your answer is no, your verdict is for the defendant and you should answer no further questions. If your answer is yes, proceed to the next question.)

3. Set forth below the dollar amount you award Plaintiff against Defendant as Compensatory Damages for his past and future physical injury, pain and suffering, mental anguish, shock and discomfort.

\$ \_\_\_\_\_  
(Fill in dollar amount)

(Proceed to the next question.)

4. Do you find that Defendant acted with malice by acting with gross indifference to the legal rights of Plaintiff?

\_\_\_\_\_  
Yes or No

(If your answer is no, you should answer no further questions. If your answer is yes, proceed to the next question.)

5. Set forth below the dollar amount you award Plaintiff as Punitive Damages on this claim.

\$ \_\_\_\_\_  
(Fill in dollar amount)

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Date: \_\_\_\_\_

\_\_\_\_\_  
Foreperson for the Jury

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